

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

KTRV LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10601 (MFW)  
(Jointly Administered)

**Re: Docket No. 165**

**NOTICE OF FILING OF REVISED EXHIBIT TO DEBTORS' APPLICATION FOR  
(I) THE RETENTION AND EMPLOYMENT OF RITCHIE BROS. AUCTIONEERS,  
INC. AS AUCTIONEER, *NUNC PRO TUNC* TO APRIL 24, 2025, (II) AUTHORIZING  
THE SALE OF EQUIPMENT FREE AND CLEAR OF ALL LIENS, CLAIMS AND  
ENCUMBRANCES; AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on April 25, 2025, the above-captioned debtors and debtors-in-possession (the “Debtors”) filed the *Debtors' Application for (I) the Retention and Employment of Ritchie Bros. Auctioneers, Inc. as Auctioneer, Nunc Pro Tunc to April 24, 2025, (II) Authorizing the Sale of Equipment Free and Clear of All Liens, Claims and Encumbrances; and (III) Granting Related Relief* (the “Application”) [Docket No. 165] with the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that the Debtors attached that certain Auction Contract dated April 24, 2025 (the “Auction Agreement”) as Exhibit 1 to the Proposed Order attached to the Application. A list of the Equipment can be found at Schedule A to the Auction Agreement (the “Equipment List”).

PLEASE TAKE FURTHER NOTICE that the Equipment List has been revised.

PLEASE TAKE FURTHER NOTICE that a copy of the revised Equipment List is attached hereto as **Exhibit A**.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with each the last four digits of each Debtor’s tax identification number, are as follows: KTRV LLC (9993), Heritage Coal & Natural Resources, LLC (8326). The Debtors’ service address is 1521 Concord Pike, Suite 201, Wilmington, DE 19803.

Dated: May 12, 2025  
Wilmington, Delaware

**MORRIS JAMES LLP**

/s/ Jeffrey R. Waxman

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*Proposed Counsel to the Debtors and Debtors  
in Possession*